

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WISCONSIN**

RHONDA D. LEWIS & WILL MATTHEWS,
individually and on behalf of similarly situated
persons,

Plaintiff,

v.

**LUCKY 2 LOGISTICS, LLC D/B/A “NEED IT
NOW COURIER”**

Defendant.

Case No. 2:19-cv-00323-PP

Jury Demanded

**JOINT STATUS REPORT REGARDING SETTLEMENT AND MEDIATION AND
UNOPPOSED MOTION TO CONTINUE STAY OF PROCEEDINGS**

The Parties respectfully request, in light of the current Covid-19 health crisis and as a matter of facilitating potential settlement of the claims in this lawsuit, that the Court approve a further stay of these proceedings, and in support thereof would show the Court as follows:

I.

Pursuant to the Court’s Orders dated June 21, 2019 (Dkt. No. 11) and November 21, 2019 (Dkt. No. 13) (the “Orders”), the Parties respectfully report that Defendant has provided Plaintiff with substantial information and documentation concerning the claims at issue and Plaintiff has completed its review and analysis of such information and documentation. In addition, the parties have exchanged their respective views and positions regarding these matters and are continuing to do so. However, the ongoing Covid-19 health crisis and applicable stay at home orders have and continue to interfere with and delay this process. The Parties are nonetheless cooperating and anticipate that at the completion of the exchange of additional information and documentation, the Parties will continue to engage in good faith settlement discussions and/or proceed to mediation in a timely fashion.

II.

The Parties therefore believe it is the interests of judicial efficiency to allow this process to continue for an additional 120 days according to the same terms and conditions as set forth in the Unopposed Motions to Stay filed on June 19, 2019 (Dkt. No. 10) and November 15, 2019 (Dkt. No. 12) and the Court's Orders. Within 15 days of the completion of the 120-day period, the Parties will again provide to the Court a status report on their progress. If settlement is not achieved, the Parties will notify the Court that settlement efforts were unsuccessful and the date when Defendant shall file its response to the Complaint, which shall be no later than thirty (30) days after such notification to the Court.

WHEREFORE, the Parties respectfully request that the Court enter an Order approving the agreements contained herein and staying this matter for 120 days pending further settlement discussions and/or mediation.

Respectfully submitted,

s/ Matthew Haynie
Matthew Haynie, Texas Bar No. 24087692
FORESTER HAYNIE PLLC
1701 N. Market Street, Suite 210
Dallas, Texas 75202
(214) 210-2100 phone
(214) 346-5909 fax
Email: matthew@foresterhaynie.com

Counsel for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that I have electronically filed the foregoing document with the Clerk of Court through the CM/ECF document filing system, which sent notification and copies of the filing to all counsel of record.

s/ Matthew Haynie

CERTIFICATE OF CONFERENCE

I hereby certify that I conferred with Defense counsel and was advised that Defendant joins in the status report and the relief sought herein.

s/ Matthew Haynie